

REC'D IN
BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE
REGULATORY AUTH.

'98 FEB 9 AM 11 41

IN RE: BellSouth Telecommunications, Inc.'s) OFFICE OF THE
Entry Into Long Distance (InterLATA)) EXERCISING SECRETARY
Service in Tennessee Pursuant to Section 271)
of the Telecommunications Act of 1996

CONSUMER ADVOCATE'S FIRST DISCOVERIES REQUEST OF BELL SOUTH
TELECOMMUNICATIONS INC.

To: BellSouth Telecommunications, Inc.
C/O Mr. Guy Hicks, General Counsel.
Suite 2101
333 Commerce Street
Nashville, Tennessee 37201-3300

Please reply to the discovery requests provided herein by: 1) answering under oath these discovery requests and serving your answers upon Consumer Advocate L. Vincent Williams or his designee at 2nd Floor, Cordell Hull Building, 425 5th Avenue North, Nashville, TN 37243; and 2) providing clear copies of the documents and things specified herein. The answer to each item should begin with the restatement of the question and should conclude with the signature and title of the person(s) responsible for answering that particular question.

Please be aware that this discovery is continuing in nature and requires BellSouth Telecommunications, Inc. to provide supplemental responses if additional or different information is obtained or as may be necessary from time to time to provide the Consumer Advocate with a full, complete and current answer or response until the hearing in this docket.

INSTRUCTIONS AND DEFINITIONS

The terms "you", "your" and "yours" as used herein refer to the addressee party of these Interrogatories as well as any and all agents, employees, representatives, experts, and other persons acting or purporting to act on your behalf.

If, for any reason, you are unable to answer a discovery request fully, submit as much information as is available and explain why your answer is incomplete. If precise information cannot be supplied, submit 1) your best estimate, so identified, and your basis for the estimate and 2) such information available to you as comes closest to providing the information requested. If you have reason to believe that other sources of more complete and accurate information exist, identify those sources.

If a document exists in different versions, including any dissimilar copies (such as a duplicate with handwritten notes on one copy, or electronic or computer versions), each version shall be treated as a different document and each must be identified and produced.

If you contend that you are entitled to refuse to fully answer any of this discovery, state the exact legal basis for each such refusal.

These discovery requests are to be interpreted broadly to fulfill the benefit of full discovery. To assist you in providing full and complete discovery, Petitioner provides the following definitional guidelines:

1. The term "person" or "persons" as used herein refers to any natural person, corporation, firm, company, sole proprietorship, partnership, business, unincorporated association, or other entity of any sort whatsoever. Where a company or organization is the party being served all responses must include the company's response. Moreover, the company's designated person for

responding must assure that the company provides complete answers. *A complete answer must provide a response which includes all matters known or reasonably available to the company.* The response is not to be limited to the knowledge of the individual responding.

2. The term "document" as used herein has the full extent of its possible meaning in accordance with law, including any written, printed, typed, drawn, filmed, taped, or recorded in any manner, however produced or reproduced, including but not limited to any writing, drawing, graph, chart, form, photograph, tape recording, computer disk or record, or other data compilation in any form. This definition shall also mean all copies of documents by whatever means made including any nonidentical versions or drafts (whether different from the original because of handwritten notes, underlining, highlighting, or otherwise).

3. The terms "and" and "or" shall be construed conjunctively or disjunctively as necessary to include any information that might otherwise be construed outside the scope of these requests.

4. References to the masculine shall include the feminine, the singular shall include the plural, and vice versa.

5. The term "communication" means any transmission of information by oral, graphic, pictorial or otherwise perceptible means, including but not limited to personal conversations, telephone conversations, letters, memoranda, telegrams, electronic mail, newsletters, recorded or handwritten messages, or otherwise.

6. Each discovery answer should begin by restating the item requested.

7. Where a number of sheets are required to fully answer an item, each sheet should be appropriately indexed, for example, Item 1(a), Sheet 1 of 6.

8. If any information requested is not furnished as requested, please state where and how the information may be obtained or extracted, the person or persons having knowledge of the procedure and the person instructing that the information be excluded.

9. Please respond fully to the request even if it has been partially requested or supplied in prior filings or dockets. The information and Rule 33 and 34 information shall be submitted to this office at 2nd Floor, Cordell Hull Building , 425 5th Avenue North, Nashville, TN 37243-0500. If there is a need for clarification of any attached request, please contact me at (615) 741-8700 before furnishing the response.

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1. Provide a red-lined version of BellSouth Telecommunications, Inc.'s Statement of Generally Available Terms (SGAT) that was filed with the Tennessee Regulatory Authority that specifies changes between the filing in TRA docket 97-00309 and in BST's Louisiana FCC filing that was rejected by the Federal Communications Commission in its order adopted on February 3, 1998 in CC Docket No. 97-231.
2. Please admit or deny the following:
 - (a.) BellSouth has **not** corrected the deficiency concerning the rejection of orders submitted by competing carriers via BellSouth's electronic interface addressed in paragraphs 23, 24, 25, and 26 of the Federal Communications Commission's order adopted February 3, 1998 in CC Docket No. 97-231.

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3. (a.) If BellSouth denies Item 2 above:
 - (i) identify the action taken, since the filing of the Louisiana application, to correct the deficiency, and
 - (ii). Identify all supporting evidence included in the current filing before the TRA.

4. (a.) (i) For each month of 1997 and year to date through the most recent completed month, what is percent of BellSouth's residential orders that electronically flow through BellSouth's ordering systems and databases? (See FCC order paragraph 24.)
 - (ii) Identify all supporting documentation that has been included in the filing with the TRA that supports the information provided in response ton 4(a)(i).
 - (iii.) Provide all other studies, analysis, reports, memoranda, etc. that support BellSouth's position concerning the information provided in response ton 4(a)(i).

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- (b.) (i) For each month of 1997 and year to date through the most recent completed month, what is the percent of BellSouth business orders that electronically flow through BellSouth's ordering system and databases? (See FCC order paragraph 24.)
 - A. Identify the percentage for Plain Old Telephone Service (POTS) orders, and
 - B. Other business service orders.
- (ii) Identify all supporting documentation that has been included in the filing with the TRA that supports the responses to Item 4(b)(i) A & B.
- (iii.) Provide all other studies, analysis, reports, memoranda, etc. that support BellSouth's responses to Item 4(b)(i) A & B..
- (c.) (i) For each month of 1997 and year to date through the most recent completed month, what is the percent of competing carriers resale orders submitted flowed through BellSouth's ordering system and databases? (See FCC order paragraph 24.)
 - A. Identify the percentage for residential orders,

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- B. Identify the percentage for Business -Plain Old Telephone Service (POTS) orders, and
 - C. Identify the percentage for other business service orders.
 - (ii) Identify all supporting documentation that has been included in the filing with the TRA that support BellSouth's responses to Item 4(c)(i) A, B, & C.
 - (iii.) Provide all other studies, analysis, reports, memoranda, etc. that support BellSouth's responses to Item 4(c)(i) A, B, & C.
5. Please admit or deny that BellSouth does not electronically notify competing carriers than an order has been rejected. (See FCC order paragraph 27.)
6. If Item 5 is denied:
- (a.) Identify the action that BellSouth has taken, since filing the Louisiana application, to correct the deficiency found by the FCC in its order adopted on February 3, 1998 in CC Docket No. 97-231.
 - (b.) Identify all supporting evidence included in the current filing before the TRA to support the position that this deficiency had been corrected.

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- (c.) Provide copies of all other studies, reports, memoranda, analysis, etc. in BellSouth's position that supports the position that this deficiency has been corrected.
- 6. Please admit or deny the following:
 - (a.) BellSouth has **not** corrected the deficiencies concerning its failure to provide competitors with information about the status of their orders in substantially the same time and manner as it provides such order status to itself. (See FCC order paragraphs 30 through 40.).
- 7.
 - (a) If Item 6 is denied, identify the corrective action taken by BellSouth, since the filing of the Louisiana application, to correct the deficiency.
 - (b) Identify all supporting documentation or other evidence included in the current filing before the TRA that supports the position that this deficiency has been corrected.

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8. (a.) For each month of 1997 and year to date through the most recent completed month identify:
 - (i) the average time required by BellSouth to notify its retail operation of an error and provide a rejection notice,
 - (ii) the average time required by BellSouth to notify competitors error and provide a rejection notice,
- (b) Provide copies of all workpapers, studies, analysis, reports, and other documents in BellSouth's position that supports BellSouth's's response to 8(a)(i) & (ii).
9. (a) For each month of 1997 and year to date through the most recent completed month identify:
 - (i) the average amount of time between the submission of an order by a competitor and the time that BellSouth provides the competitor firm order confirmation,
 - (ii) the average time required by BellSouth to provide equivalent information to its retail operations.

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- (b) Provide copies of all workpapers, studies, analysis, reports, and other documents in BellSouth's possession that supports the data provided in response to 9 (a)(i)&(ii).
- 10. Admit or deny that BellSouth is **not** providing order jeopardy notices to competing carriers for delays that BellSouth causes. (See paragraph 39 of February 3, 1998 FCC order in CC Docket No. 97-231)
- 11. If Item 10 is denied:
 - (a) identify all action taken by BellSouth, since the filing of the Louisiana application, to correct the deficiency.
 - (b) identify all evidence in the current filing before the TRA that supports the position that BellSouth is providing order jeopardy notices to competing carriers for delays that BellSouth causes, and.
 - (c) provide all other analysis, reports, studies, documents, etc. in BellSouth's position that support the position that these such order jeopardy notices have been and are being provided when the delay is caused by BellSouth.

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12. For each month of 1997 and year to date through the most recent completed month provide:
- (a) The average time interval from when BellSouth first receives an order from a competing carrier to when BellSouth installs the service.
 - (b) The average time interval from when BellSouth first receives an order from a retail customer to when BellSouth installs the service.
 - (c) Identify all supporting documents in the current filing before the TRA that the information provided in response to 12 (a) & (b).
 - (d) Provide copies of all workpapers, studies, analysis, reports, and other documents in BellSouth's possession that supports the data provided in response to 12 (a) & (b).
13. For each month of 1997 and year to date through the most recent completed month identify:
- (a) The average interval from the time that an order is received from a competing carrier until the due date.
 - (b) The average interval from the time that BellSouth takes an order for a retail customer until the due date.
 - (c) Identify all supporting documents in the current filing before the TRA that the information provided in response to 13 (a) & (b).

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- (d) Provide copies of all workpapers, studies, analysis, reports, and other documents in BellSouth's possession that supports the data provided in response to 13 (a) & (b).
- 14. Please admit or deny that BellSouth does **not** integrate the LENS and the EDI ordering system for competing carrier.
- 15. If BellSouth denies Item 14, identity the action that BellSouth has taken, since the filing of the Louisiana application, to integrate the LENS and the EDI ordering system for competing carrier.
- 16. (a) If BellSouth denies Item 14, identity all documentation and other evidence in the current filing before the TRA that supports BellSouth's position that it does integrate the LENS and the EDI ordering system for competing carriers.
(b) If BellSouth denies Item 14, provide copies of all other documentation in BellSouth's possession that support the position that BellSouth does integrate the LENS and the EDI ordering systems for competing carriers.

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17. Please admit or deny that BellSouth does not provide competing carriers with the technical specifications necessary to integrate BellSouth's pre-ordering interface with competing carriers's operational support system and the EDI ordering interface.
18. If BellSouth denies Item 17, identity the action that BellSouth has taken, since the filing of the Louisiana application, to provide competing carriers with the technical specifications necessary to integrate BellSouth's pre-ordering interface with competing carriers's operational support system and the EDI ordering interface.
19. (a) If BellSouth denies Item 17, identity all documentation and other evidence in the current filing before the TRA that supports BellSouth's position that it does provide competing carriers with the technical specifications necessary to integrate BellSouth's pre-ordering interface with competing carriers's operational support system and the EDI ordering interface.

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- (b) If BellSouth denies Item 17, provide copies of all other documentation in BellSouth's possession that support the position that BellSouth does provide competing carriers with the technical specifications necessary to integrate BellSouth's pre-ordering interface with competing carriers's operational support system and the EDI ordering interface.
- 20. If BellSouth denies Item 17, identify the action that BellSouth has taken to provide competing carriers with the technical specifications necessary to integrate BellSouth's pre-ordering interface with competing carriers's operational support system and the EDI ordering interface, since it filed its Louisiana application.
- 21. For each BellSouth exchange in Tennessee identify:
 - (a) The current number of residential access lines that BellSouth knows are being served by a competitive local exchange carrier using:
 - (i) facilities owned by that carrier, (identify the number of lines being served by each competitive service provider)

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- (ii) using unbundled network elements purchased from BellSouth,(identify the number of lines being served by each competitive service provider), and
 - (iii) resale of BellSouth services (identify the number of lines being served by each competitive service provider).
- (b) The current number of single line business access lines that BellSouth knows are being served by a competitive local exchange carrier using:.
 - (i) facilities owned by that carrier (identify the number of lines being served by each competitive service provider),
 - (ii) using unbundled network elements purchased from BellSouth (identify the number of lines being served by each competitive service provider), and
 - (iii) resale of BellSouth services (identify the number of lines being served by each competitive service provider).

As used in this item, competitive local exchange carrier do not include PCS carriers.

22. Please explain how BellSouth knows the number of lines being served by competitive local exchange carriers. Provide all supporting documentation.

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23. For each BellSouth exchange in Tennessee identify the current:
- (a) number of residential customers that have discontinued land line service and replaced it with PCS service (identify the number of lines being served by each PCS provider)
 - (b) number of business customers that have discontinued land line service and replaced it with PCS service (identify the number of lines being served by each competitive service provider).
24. Please explain how BellSouth knows the number of former BellSouth land line customers are being served by PCS service providers. Provide all supporting documentation.
25. For each BellSouth exchange in Tennessee identify:
- (a) The current number of residential access lines that BellSouth does not know but believes are being served by a competitive local exchange carrier using:
 - (i) facilities owned by that carrier, (identify the number of lines being served by each competitive service provider)
 - (ii) using unbundled network elements purchased from BellSouth,(identify the number of lines being served by each competitive service provider), and

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- (iii) resale of BellSouth services (identify the number of lines being served by each competitive service provider).
- (b) The current number of single line business access lines that BellSouth does not know but believes are being served by a competitive local exchange carrier using:
 - (i) facilities owned by that carrier (identify the number of lines being served by each competitive service provider),
 - (ii) using unbundled network elements purchased from BellSouth (identify the number of lines being served by each competitive service provider), and
 - (iii) resale of BellSouth services (identify the number of lines being served by each competitive service provider).

As used in this item competitive local exchange carrier do not include PCS carriers.

26. Please explain the basis for BellSouth's belief that the number of access lines identified in Item 25 are being served by competitive local exchange carriers. Provide all supporting documentation.

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27. For each BellSouth exchange in Tennessee identify:
- (a) The current number of telephone numbers for which BellSouth is currently providing number portability.
 - (i) Residential.(Identify the number of lines by competitive carrier.)
 - (ii) Single Line Business (Identify the number of lines by competitive carrier.)
 - (iii) Multi line Business (Identify the number of lines by competitive carrier.)
28. For each month of 1997 and year to date through the most recently completed month identify:
- (i) BellSouth's net increase in the number of residential access lines in Tennessee.
 - (ii) BellSouth's net increase in the number of BellSouth single line business access lines in Tennessee.
 - (iii) BellSouth's net increase in the number of BellSouth multi- line business access lines in Tennessee.

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29. For each month of 1997 and year to date through the most recently completed month identify:
- (i) The net increase in the number of residential access lines in Tennessee that BellSouth believes are served by competitive local exchange carriers. (Provide supporting documentation.)
 - (ii) The net increase in the number of single line business access lines in Tennessee that BellSouth believes are served by competitive local exchange carriers. (Provide supporting documentation.).
 - (iii) The net increase in the number multi- line business access lines in Tennessee that BellSouth believes are served by competitive local exchange carriers. (Provide supporting documentation.)
30. If BellSouth is allowed entry into the InterLATA market in Tennessee:
- (a.) Identify the rates that it proposes to charge for MTS traffic.
 - (b.) Identify the estimated amount that BellSouth's average long distance rates would fall below or above the current average charged by AT&T, MCI, & Sprint. (Provide supporting documentation.)

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- (c.) Identify the estimated:
 - (i) Reduction or increase in the average Tennessee residential customer's intrastate monthly long distance bill. (Provide detailed workpapers.)
 - (ii) Reduction or increase in the average Tennessee business customer's intrastate long distance bill. (Provide detailed workpapers.)
- 31. (a) Admit or deny that BellSouth will make available for resale and at an additional 16% discount to competitive service providers all of its contract service arrangements (both currently effective and all future contracts), including the multistate contracts under which Tennessee intrastate service is provided.
- (b) If 31(a) is denied, provide a complete explanation of why it would not violate the provisions of the Telecommunications Act of 1996 and the Tennessee Regulatory Authority's order in Docket 96-01331 to prohibit such resale.
- (c) If 31(a) is admitted, identify the number of such contract service arrangements currently in effect that BellSouth will make available for resale.

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- (d) Identify, by competitive carrier, the number of contract service arrangements that are presently being provided under resale in Tennessee.
32. (a) Admit or deny that if a customer being served under a contact service arrangement elects (prior to expiration of the contract) to recieve service from a competitive carrier under a resale arrangement, BellSouth will not consider the contract service arrangement terminated by the customer, but will continue to provide the service in the exact same fashion with no changes in quality or level of service.
- (b) If 32(a) is denied provide a complete explanation why this would not violate the provisions of the Telecommunications Act of 1996 and the Tennessee Regulatory Authority's order in Docket 96-01331.

Certificate of Service

I hereby certify that on February 9, 1998, a copy of the foregoing document was served on the parties of record, vial facsimile, hand delivery, overnight or U.S. Mail, postage pre-paid.

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